



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

'APR 14 2011'

Mr. Mark Smith, Chief
Hazardous Waste Management Branch
Environmental Protection Division
Georgia Department of Natural Resources
Two Martin Luther King, Jr. Drive
Suite 1154 East
Atlanta, Georgia 30334

SUBJ: Resource Conservation Recovery Act (RCRA) Compliance Evaluation Inspection
(CEI) Clorox Products Manufacturing Company (GAD 051 039 402)

Dear Mr. Smith:

On February 23, 2011, an Environmental Protection Agency (EPA) lead RCRA CEI was conducted by EPA at the Clorox Products Manufacturing Company, in Forest Park, Georgia, to determine the facility's compliance status with RCRA.

Enclosed is the EPA RCRA CEI report which indicates secondary violations of RCRA were discovered.

If you have any questions regarding the inspection, please contact Brooke York, of my staff, by phone at (404) 562-8025 or by e-mail at york.brooke@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Truman".

Bill Truman, Acting Chief
ROECB South Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

APR 14 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David Creamer, Environmental Manager
Clorox Manufacturing Company
17 Lake Mirror Road
Forest Park, Georgia 30297

SUBJ: Resource Conservation Recover Act (RCRA) Compliance Evaluation Inspection (CEI)
Clorox Products Manufacturing Company (GAD 051 039 402)

Dear Mr. Creamer:

On February 23, 2011, an Environmental Protection Agency (EPA) lead RCRA CEI was conducted by the EPA at the Clorox Products Manufacturing Company in Forest Park, Georgia, to determine the facility's compliance status with RCRA.

Enclosed is the EPA RCRA CEI report which indicates secondary violations of RCRA were discovered. If you have any questions regarding the inspection, please contact Brooke York, of my staff, by phone at (404) 562-8025 or by e-mail at york.brooke@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Truman", written over a horizontal line.

Bill Truman, Acting Chief
ROECB South Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch

Enclosure

cc: Ms. Renee Hudson Goodley, GAEPD
Ms. Cherjuana Crawford, GAEPD

**United States Environmental Protection Agency (EPA)
Region 4, Atlanta, Georgia
Compliance Evaluation and Inspection Report**

1) Inspector and Author of Report

Brooke York, Environmental Engineer
U.S. Environmental Protection Agency
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-8025
York.brooke@epa.gov

2) Facility Information

Clorox Products Manufacturing Company
17 Mirror Lake Road
Forest Park, Georgia 30297

EPA ID Number: GAD051039402

3) Responsible Officials

David Creamer, Environmental Manager
Clorox Products Manufacturing Company, Forest Park, Georgia
(404) 362-8628

4) Inspection Participants

David Creamer, Environmental Manager, Clorox Products Manufacturing Company
Randy Jackson, Environmental Engineer, U.S. Environmental Protection Agency (EPA)
Brooke York, Environmental Engineer, EPA
William Truman, Acting South Section Chief RCRA and OPA Enforcement and
Compliance Branch, EPA
Aaryn Jones, Environmental Scientist, EPA

5) Date and Time of Inspection

February 23, 2011, 9:35 a.m.

6) Applicable Regulations

Resource Conservation Recovery Act (RCRA), 42 U.S.C.A. §§ 6901 to 6992k
Sections 3005 and 3007 of RCRA, 42 U.S.C.A. §§ 6925 and 6927
40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279

The Georgia Hazardous Waste Management Act, §§ 12-8-60 to 83 of the Official Code of Georgia Annotated

Chapter 391-3-11 of the Rules of the Georgia Hazardous Waste Management Act, which adopts and incorporates by reference 40 C.F. R. Parts 260-266, 268 and 270, 273 and 279. Therefore, the citations in this report will be to the Rules found in 40 C.F.R. Parts 260-270, 273, and 279.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine whether Clorox Product Manufacturing Company was in compliance with the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

8) Facility Description

The Clorox Product Manufacturing Company (Clorox) manufactures a variety of household cleaning products such as Pine-sol, Tilex, 409 and Clorox Clean-up. Some of the products can be seen in Figures 2-4 of Attachment 1. Approximately 27% of the products manufactured at this facility are bleach and 73% home cleaners. The facility has been in operation since 1971. The covered portion of the facility is approximately 300,000 square feet and access controlled. Clorox employs 247 people and operates two shifts seven days a week. The North American Industry Classification System codes for this facility are 325612, polish and other sanitation good manufacture, and 32616, plastic bottle manufacture.

Clorox initially notified EPA as a small quantity generator on January 14, 1997. They re-notified as a large quantity generator on October 29, 2007. The change in generator status was due to special projects that were being conducted at the facility. These special projects included research and development. During the time that Clorox was generating large quantities of waste several product lines had been transferred to the Forest Park facility for production. Over time the production line for these new products has developed final formulations and the waste generated from these lines has declined. Clorox re-notified EPA as a small quantity generator on March 1, 2010. Clorox continues to generate waste ink containing methyl ethyl ketone (D035), waste chloroform (D022) generated by the lab, other lab generated wastes (D005, D009), off specification products (U031, U080, U122, U143, U162, U226) and used oil.

The manufacture of the products is accomplished by mixing ingredients in large tanks, filling the product bottles, and boxing the product using a conveyor belt system. The ingredients arrive at the facility ready to be mixed. No chlorine is manufactured at this facility.

9) **Previous Inspection History**

This facility was inspected within the past five years. On October 19, 2007 Georgia EPD conducted a Compliance Evaluation Inspection. During this inspection six apparent violations of RCRA were found and the facility was listed as a Significant Non-Complier (SNC). The six violations are listed as follows according to RCRA Info:

- State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements. Specifically, 391-3-11-.04(1), which states "Every hazardous waste generator, treatment, or disposal facility shall notify the Division of such activities on forms provided by the Director."
- State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements. Specifically, 391-3-11-.08, which states "Hazardous Waste Manifests shall be on forms as designated by the Director and shall be completed as required by the instructions supplied."
- 40 C.F.R. § 262.34(a)(3) which states "While being accumulated on-site each container and tank is labeled or marked clearly with the words, "Hazardous Waste.""
- 40 C.F.R. § 262.41(a) which reads "A generator who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must prepare and submit a single copy of a Biennial Report to the Regional Administrator by March 1 of each even numbered year."
- 40 C.F.R. § 262.41(a)(6) which indicates that efforts made by the facility to reduce the volume and toxicity of its wastes should be included in the Biennial Report.
- 40 C.F.R. § 273.13(a) which details the universal waste management practices for small quantity handlers to prevent releases to the environment.

On March 12, 2008, a Compliance Schedule Evaluation was conducted by Georgia EPD. No violations were found during this visit.

On November 19, 2008, a CEI was conducted. One violation of 40 C.F.R. § 262.20(a), general requirements for the manifest, was found.

On August 5, 2010, a Compliance Assistance Visit was performed by Georgia EPD.

10) **Findings**

On February 23, 2011, Brooke York, Randy Jackson, Aaryn Jones, and Bill Truman of EPA, arrived at the Clorox facility at approximately 9:35 a.m. and checked in at the front desk. Facility representative, David Creamer, Environmental Manager, Clorox,

immediately received the inspectors. The inspectors introduced themselves, presented their credentials, and explained the purpose of the visit.

The following areas were inspected: Recycling Area, Less Than 180-Day Hazardous Waste Storage Area, Universal Waste Storage, Ink Satellite Accumulation, Laboratory, Laboratory Satellite Accumulation Area, and Records.

Recycling Area

The Recycling Area was located in the rear of the conveyor belt production line. Bails of containers and bottles that have been discarded and rejected from the process were located in the Recycling Area. These bails are managed using a forklift. During management of the bails some of the bottles and containers may be freed of the bail and fall to the floor in the Recycling Area. These bottles are picked up and placed in the trashcan located in the Recycling Area as seen in Figures 5 and 6 of Attachment 1. These bottles are allowed to drain into the trashcan and then re-bailed for recycling. It is recommended that Clorox allow the bottles to drain before they are bailed initially to reduce the possibility of environmental releases, insure proper disposal and reduce risk to human health.

Less Than 180-Day Hazardous Waste Storage Area

The Less Than 180-Day Hazardous Waste Storage Area (Storage Area) was located in the rear of the conveyor belt production line next to the Recycling Area. The Storage Area was locked and enclosed in chain link fence with signage designating the area, as seen in Figures 8 and 9 of Attachment 1. In addition to signage indicating that this area held hazardous waste, the gate to the Storage Area bore a fire extinguisher location map, spill kit location map and contact numbers for Mr. Creamer, Environmental Manager, and Mr. Pinkston, Plant Engineering Manager. A photo of the call down list posted on the gate of the Storage Area can be seen in Figure 32 of Attachment 1. It is recommended that contact numbers for the National Response Center, the local Fire Department, and Georgia Environmental Protection Division be added to this list.

At the time of the CEI, the Storage Area held no hazardous waste. In the rear of the Storage Area, several containment pallets were indicated as the location where hazardous waste would be stored. The floor in the Storage Area was wet. The floor had been allowed to dry and a white residue had formed, as seen in Figure 9 and 11 of Attachment 1. Mr. Creamer indicated that some water had been spilled outside the area and flowed into the Storage Area from under the fencing. The inspectors recommended to Mr. Creamer that the floor should be cleaned promptly after all spills. The Storage Area held boxes, plastic for recycling, empty drums and trashcans as seen in Figure 11 of Attachment 1.

The Storage Area was inspected weekly using a checklist that can be seen in Attachment 2. The inspection is conducted by walking through the Storage Area and the Satellite Areas and filling out the inspection checklist.

Universal Waste Storage

Universal Waste Storage was located inside the Storage Area and limited to a separate section with a shelf. A box of spent lamps was located in the Universal Storage Area. This box was found to be closed, labeled and dated as seen in Figure 10 of Attachment 1.

Ink Satellite Accumulation Area

The Ink Satellite Accumulation Area, located immediately next to the Storage Area, can be seen in Figure 14 of Attachment 1. The Ink Satellite Accumulation Area was indicated by a sign on the shelf above it and was accompanied by a call down list. One 55-gallon blue metal drum and a Rubbermaid® tote were located in the Ink Satellite Accumulation Area at the time of the CEI.

The blue metal drum had a metal funnel cap with a screw in plug which sealed the container properly to prevent a spill in the event that the container was tipped as seen in Figures 12 and 13 of Attachment 1. The blue metal drum contained waste ink as indicated by a paper label bearing the words "Ink Satellite Waste Container." The inspectors indicated to Mr. Creamer that the container should bear the words "Hazardous Waste" in order to distinguish this waste from solid waste.

Clorox was in apparent violation of Chapter 391-3-11-.08 of the Georgia Hazardous Waste Management Act which incorporates by reference 40 C.F.R.

§ 262.34(c)(1)(ii). A generator must mark containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

Mr. Creamer immediately wrote the words "Hazardous Waste" on the container label as seen in Figure 19 of Attachment 1. Mr. Creamer informed the inspectors that the drum would bear the words "Hazardous Waste" from that time forward.

The Rubbermaid® tote contained spent batteries in a variety of sizes. This was indicated by a Universal Waste label dated February 14, 2011, and affixed to the front of the tote as seen in Figure 18 of Attachment 1.

In the isle way by the Ink Satellite Accumulation Area a black 55-gallon drum labeled "Waste Anti" was located as seen in Figures 15 and 16 of Attachment 1. It is recommended that an acceptable area be set aside to store solid waste and that solid waste not be stored in the isle way of the Ink Satellite Accumulation Area.

Laboratory Satellite Accumulation Area

The Laboratory Satellite Accumulation Area located outside the door to the Laboratory and was indicated by a label on the wall as seen in Figure 20 of Attachment 1. The cabinet located in this area contained 7 bottles of hazardous waste.

The first bottle that was inspected was a 2.5 liter bottle that was labeled with the words "Hazardous Waste" as seen in Figure 21 of Attachment 1. This bottle was found to bear two separate dates January 29, 2011 and May 16, 2009.

Clorox was in apparent violation of Chapter 391-3-11-.08 of the Georgia Hazardous Waste Management Act which incorporates by reference 40 C.F.R. § 262.34(a)(2). The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

The second bottle inspected was a 4-liter bottle that was labeled with the words "Chloroform Waste" as seen in Figure 22 of Attachment 1. This bottle was dated February 18, 2011.

The third bottle inspected was a 4-liter bottle that was labeled with the words "Chloroform Waste Bottle" as seen in Figure 23 of Attachment 1. This bottle was dated February 6, 2011.

The fourth bottle inspected was a 4-liter bottle labeled with the words "Chloroform Waste Only" as seen in Figure 24 of Attachment 1. This bottle was dated February 14, 2011.

The fifth bottle inspected was a 4-liter bottle labeled with the words "Chloroform Waste Bottle" as seen in Figure 25 of Attachment 1. This bottle was undated.

Clorox is in apparent violation of Chapter 391-3-11-.08 of the Georgia Hazardous Waste Management Act which incorporates by reference 40 C.F.R. § 262.34(a)(2). The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

The sixth bottle inspected was labeled with the words "Chloroform Waste Bottle" as seen in Figure 26 of Attachment 1. This bottle was dated January 31, 2011.

The seventh bottle inspected was labeled with the words "Chloroform Waste" as seen in Figure 27 of Attachment 1. This bottle was dated February 23, 2011.

The Laboratory Satellite Accumulation Area is intended to be used as a satellite accumulation area. However, since the area contained 7 full bottles of hazardous waste, 6 of which were dated, it is the opinion of EPA that this area is being used as a hazardous waste storage area. In order to comply strictly with the regulations, it is suggested that the management of this satellite accumulation area be reevaluated.

Laboratory

The laboratory contained a fume hood which housed a 4-liter "Chloroform Waste Bottle" and a "Pine-sol Waste Bottle" as seen in Figures 28-30 of Attachment 1. These bottles were located at the point of generation, closed and labeled with the contents. Mr. Creamer indicated that the Pine-sol Waste would be recycled into the process. The trashcan in the Laboratory was found to contain personal protective equipment (PPE) and pipettes as seen in Figure 31 of Attachment 1. The inspectors asked if Clorox had ever profiled the waste coming from the lab operations that was being disposed of in the trashcan. Mr. Creamer indicated that the waste had not been profiled.

Clorox was in apparent violation of Chapter 391-3-11-.08 of the Georgia Hazardous Waste Management Act which incorporates by reference 40 C.F.R. § 262.11, for failing to make a hazardous waste determination.

Recordkeeping

After the facility walk through, Mr. Creamer invited the inspectors to his office to review manifests for the last three years.

Manifests

Upon review of the hazardous waste manifests it was determined that Clorox employs Veolia and Clean Harbors for its waste disposal needs. The manifests reviewed were in order and each had a returned signed copy except the most recent shipment dated January 28, 2011. The manifest numbers assigned to the shipment dated January 28, 2011, were 000365402VES and 000365403VES. Mr. Creamer was informed that signed copies of these manifests should be placed in his file as soon as he receives them and that if he has not received a returned signed copy within 60 days of date the shipment was accepted, he will need to file an exception report.

11) Out-Briefing

The inspectors conducted the exit meeting on February 23, 2011. During this meeting, the inspectors stated the preliminary conclusions of the inspection.

12) Conclusion

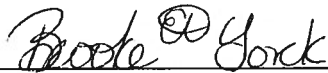
Based on the observations made during the inspection, the following apparent violations were observed:

1. Pursuant to 40 C.F.R. § 262.34(c)(1)(ii), and Georgia Hazardous Waste Management Act, Chapter 391-3-11-.08, a generator must mark containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.
2. Pursuant to 40 CFR § 262.34(a)(2), and Chapter 391-3-11-.08 of the Georgia Hazardous Waste Management Act, the date upon which each period of accumulation begins should be clearly marked and visible for inspection on each container.
3. Pursuant to 40 CFR § 262.11, and Chapter 391-3-11-.08 of the Georgia Hazardous Waste Management Act, it is required that a generator make a hazardous waste determination on waste streams.

Based on the observations made during the inspection, the following recommendations are offered:

1. Allow the bottles to drain before they are bailed initially to reduce the possibility of environmental releases, insure proper disposal and reduce risk to human health.
2. Add the contact numbers for the National Response Center, the local Fire Department, and Georgia Environmental Protection Division.
3. It is recommended that an acceptable area be set aside to store solid waste and that solid waste not be stored in the isle way of the Ink Satellite Accumulation Area.
4. In order to comply strictly with the regulations, it is suggested that the management of this satellite accumulation area be reevaluated.

13) **Signed**



Brooke York, Environmental Engineer
RCRA and OPA Enforcement and Compliance South Section
RCRA and OPA Enforcement and Compliance Branch,
RCRA Division

4/14/2011

Date

Concurrence



Bill Truman, Acting Chief
RCRA and OPA Enforcement and Compliance South Section
RCRA and OPA Enforcement and Compliance Branch
RCRA Division

4/14/2011

Date

Attachment 1



Figure 1: Sign in the Lobby.



Figure 2: Pine-sol mixed and bottled at the Clorox facility.



Figure 3: Clorox Toilet Bowl Cleaner mixed and bottled at the Clorox facility.



Figure 4: Household consumer products mixed and bottled at the Clorox facility.



Figure 5 & 6: Trashcan located in the Recycling Area. Trashcan contains bottles that have fallen out of bails that are to be sent to the Recycler. These bottles are being allowed to drain before re-bailing for shipment to Recycler.



Figure 7 & 8: Hazardous placard, emergency contacts, and evacuation plan posted on the gate leading to the Less Than 90 Day Storage Area.



Figure 9: Floor in the Less Than 90 Day Storage Area.



Figure 10: Box of spent lamps labeled Universal Waste and found in a closed and dated cardboard container.



Figure 11: Less Than 90 Day Storage Area



Figure 12: The funnel that capped the Waste Ink Drum Satellite Drum. This funnel was found sealed and closed.

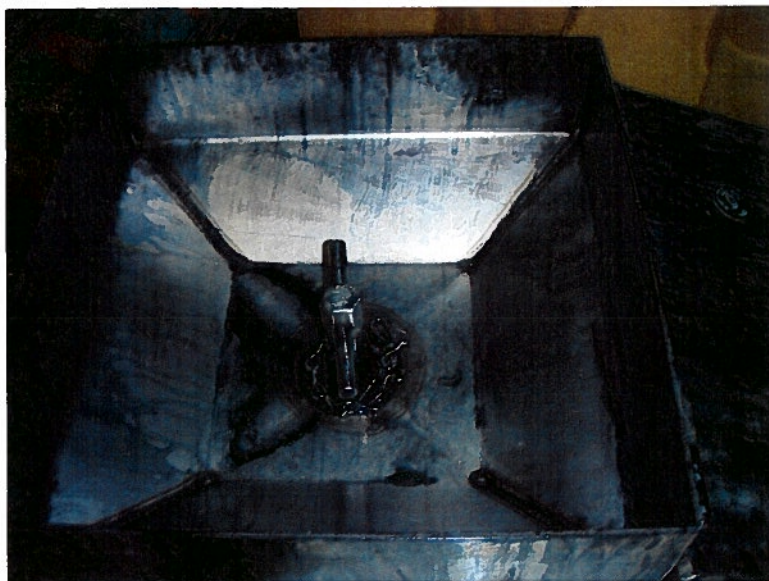


Figure 13: Funnel Cap located atop the Waste Ink Satellite Drum.



Figure 14: Waste Ink Satellite Drum labeled Ink Satellite Waste Container. The words Hazardous Waste are not found on the label.



Figure 15 & 16: 55 gallon drum located in the Waste Ink Satellite Area labeled waste antifreeze.



Figure 17: Rubbermaid tote used to store miscellaneous batteries for disposal.



Figure 18: Label located on the side of the Rubbermaid tote containing miscellaneous spent batteries.



Figure 19: Correction made to the Ink Satellite Waste drum while EPA Inspectors were present.



Figure 20: Cabinet outside of the Lab Area. This cabinet was found to house 7 bottles of waste.

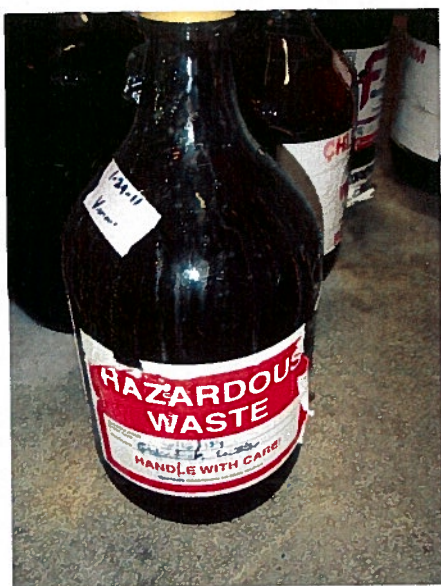


Figure 21: 2.5 liter bottle of Waste Chloroform located in the cabinet outside of the lab. Bottle labeled with 2 dates, 1-29-11 and 5-16-09.



Figure 22: 4 liter bottle of Waste Chloroform dated 2-18-11 but without a Hazardous Waste label located in the cabinet outside of the lab.



Figure 23: 4 liter Waste Chloroform bottle dated 2-6-2011 without Hazardous Waste label located outside of the lab.

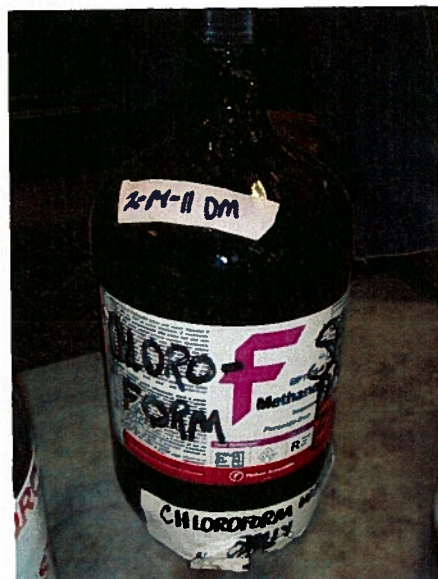


Figure 24: 4 liter bottle of Waste Chloroform dated 2-14-11 with no Hazardous Waste label.



Figure 25: Waste Chloroform bottle located outside of the lab with no date and no Hazardous Waste label.

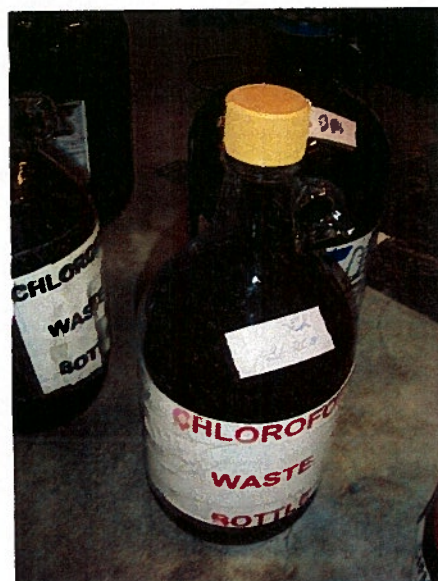


Figure 26: Waste Chloroform bottle located in cabinet outside of the lab dated 1-31-11 with no Hazardous Waste label.



Figure 27: Waste Chloroform bottle located in cabinet outside of lab dated 2-23-11 with no Hazardous Waste label.



Figure 28: Contents of fume hood in lab.

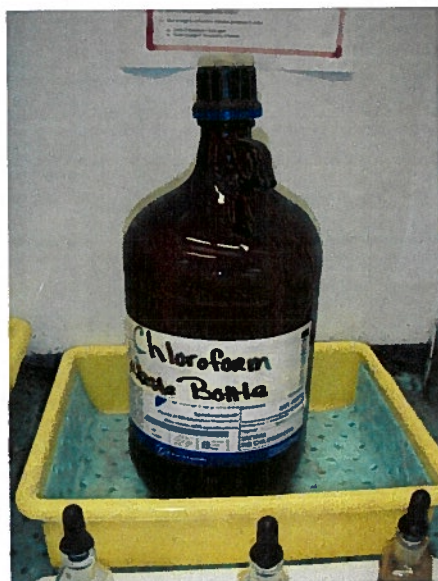


Figure 29: Waste Chloroform bottle located in the fume hood in the lab with no Hazardous Waste Label.

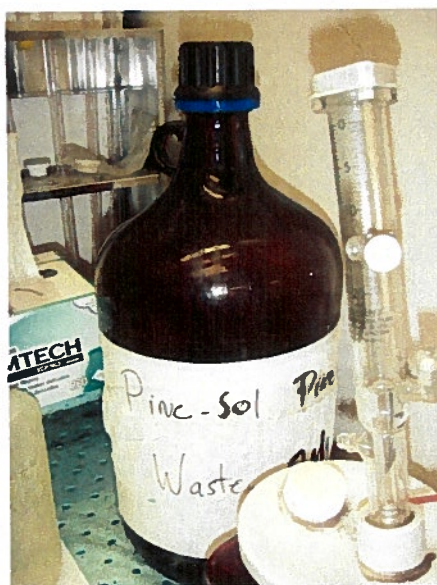


Figure 30: Pine-sol Waste bottle located in the fume hood in the lab.



Figure 31: Contents of trashcan in the lab includes PPE and pipettes.

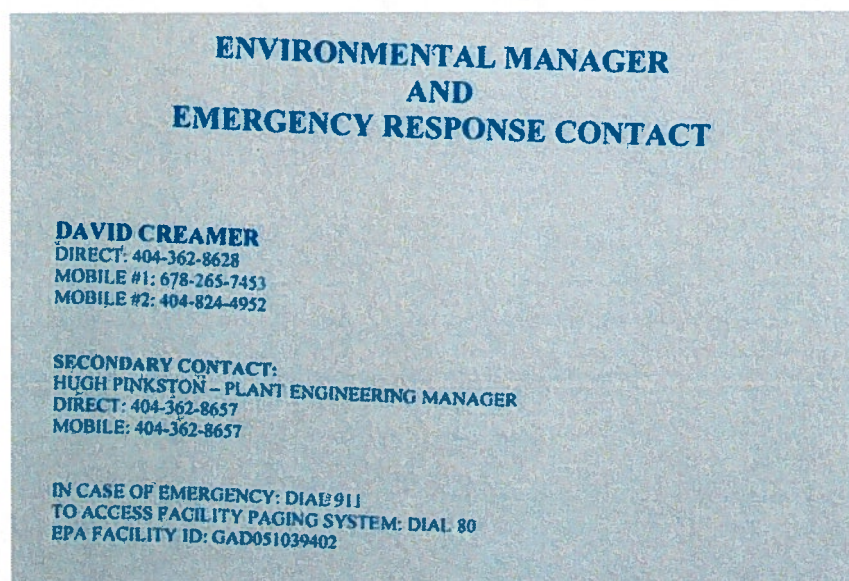


Figure 32: Call down list located on the gate of the Less Than 90 Day Storage Area.

**Clorox Products Manufacturing Company
Hazardous Waste Weekly Inspection Form**

Date: 4/28/11

Inspector: Larry Asken

Hazardous Waste Storage Areas/Containers Inspection Results:

- Do all drums have proper labels? ☒ Yes ☐ No
- Does the label indicate an accumulation start date? ☒ Yes ☐ No
- Does the label indicate the container contents? ☒ Yes ☐ No
- Are dates on drums less than 180 days old? ☒ Yes ☐ No
- Are all drums in good condition? ☐ Yes ☐ No
- No leaking containers? ☒ Yes ☐ No
- No containers rusting or deteriorating? ☒ Yes ☐ No
- Drums securely closed ☒ Yes ☐ No
- Is the floor free from stains or puddles of liquid? ☒ Yes ☐ No
- Is the area free of other spill or fire hazards? ☒ Yes ☐ No
- Are incompatible wastes separated? ☒ Yes ☐ No

Note volume of each accumulated waste: (Do not list used oil, bulbs, batteries, mercury switches or other universal wastes)

Quantity	Item Description	Date on Container

If you check "No" to any of the questions above, please explain below:

Action Item	Corrective Action	Date Completed

**Clorox Products Manufacturing Company
Hazardous Waste Weekly Inspection Form**

Date: 2/4/11

Inspector: L. Askew

Hazardous Waste Storage Areas/Containers Inspection Results:

- Do all drums have proper labels? ☒ Yes ☐ No
 Does the label indicate an accumulation start date? ☒ Yes ☐ No
 Does the label indicate the container contents? ☒ Yes ☐ No
 Are dates on drums less than 180 days old? ☒ Yes ☐ No
 Are all drums in good condition? ☒ Yes ☐ No
 No leaking containers? ☒ Yes ☐ No
 No containers rusting or deteriorating? ☒ Yes ☐ No
 Drums securely closed ☒ Yes ☐ No
 Is the floor free from stains or puddles of liquid? ☒ Yes ☐ No
 Is the area free of other spill or fire hazards? ☒ Yes ☐ No
 Are incompatible wastes separated? ☒ Yes ☐ No

*Pickup of
haz waste
on Jan 28th
so no
inventory
to track.*

Note volume of each accumulated waste: (Do not list used oil, bulbs, batteries, mercury switches or other universal wastes)

Quantity	Item Description	Date on Container

If you check "No" to any of the questions above, please explain below:

Action Item	Corrective Action	Date Completed

**Clorox Products Manufacturing Company
Hazardous Waste Weekly Inspection Form**

Date: 2/11/11

Inspector: Creamer

Hazardous Waste Storage Areas/Containers Inspection Results:

- Do all drums have proper labels? ☒ Yes ☐ No
Does the label indicate an accumulation start date? ☒ Yes ☐ No
Does the label indicate the container contents? ☒ Yes ☐ No

Are dates on drums less than one year old? ☒ Yes ☐ No

Are all drums in good condition? ☒ Yes ☐ No
No leaking containers? ☒ Yes ☐ No
No containers rusting or deteriorating? ☒ Yes ☐ No
Drums securely closed ☒ Yes ☐ No

Is the floor free from stains or puddles of liquid? ☒ Yes ☐ No

Is the area free of other spill or fire hazards? ☒ Yes ☐ No

Are incompatible wastes separated? ☒ Yes ☐ No

no
inventory
recent
waste pickup

Note volume of each accumulated waste: _____

If you check "No" to any of the questions above, please explain below:

Action Item	Corrective Action	Date Completed

**Clorox Products Manufacturing Company
Hazardous Waste Weekly Inspection Form**

Date: 2-18-11

Inspector: Larry Askew

Hazardous Waste Storage Areas/Containers Inspection Results:

- Do all drums have proper labels? ☒ Yes ☐ No
 Does the label indicate an accumulation start date? ☒ Yes ☐ No
 Does the label indicate the container contents? ☒ Yes ☐ No
 Are dates on drums less than 180 days old? ☒ Yes ☐ No
 Are all drums in good condition? ☒ Yes ☐ No
 No leaking containers? ☒ Yes ☐ No
 No containers rusting or deteriorating? ☒ Yes ☐ No
 Drums securely closed ☒ Yes ☐ No
 Is the floor free from stains or puddles of liquid? ☒ Yes ☐ No
 Is the area free of other spill or fire hazards? ☒ Yes ☐ No
 Are incompatible wastes separated? ☒ Yes ☐ No

Recent
waste
pickup
no
current
inventory

Note volume of each accumulated waste: (Do not list used oil, bulbs, batteries, mercury switches or other universal wastes)

Quantity	Item Description	Date on Container

If you check "No" to any of the questions above, please explain below:

Action Item	Corrective Action	Date Completed

**Clorox Products Manufacturing Company
Hazardous Waste Weekly Inspection Form**

Date: 2/25

Inspector: L. Asken

Hazardous Waste Storage Areas/Containers Inspection Results:

- Do all drums have proper labels? ☒ Yes ☐ No
- Does the label indicate an accumulation start date? ☒ Yes ☐ No
- Does the label indicate the container contents? ☒ Yes ☐ No
- Are dates on drums less than 180 days old? ☒ Yes ☐ No
- Are all drums in good condition? ☒ Yes ☐ No
- No leaking containers? ☒ Yes ☐ No
- No containers rusting or deteriorating? ☒ Yes ☐ No
- Drums securely closed ☒ Yes ☐ No
- Is the floor free from stains or puddles of liquid? ☒ Yes ☐ No
- Is the area free of other spill or fire hazards? ☒ Yes ☐ No
- Are incompatible wastes separated? ☒ Yes ☐ No

no inventory

Note volume of each accumulated waste: (Do not list used oil, bulbs, batteries, mercury switches or other universal wastes)

Quantity	Item Description	Date on Container

If you check "No" to any of the questions above, please explain below:

Action Item	Corrective Action	Date Completed

**Clorox Products Manufacturing Company
Hazardous Waste Weekly Inspection Form**

Date: 3-11-11

Inspector: L. Askeu

Hazardous Waste Storage Areas/Containers Inspection Results:

- Do all drums have proper labels? ☒ Yes ☐ No
- Does the label indicate an accumulation start date? ☒ Yes ☐ No
- Does the label indicate the container contents? ☒ Yes ☐ No
- Are dates on drums less than 180 days old? ☒ Yes ☐ No
- Are all drums in good condition? ☒ Yes ☐ No
- No leaking containers? ☒ Yes ☐ No
- No containers rusting or deteriorating? ☒ Yes ☐ No
- Drums securely closed ☒ Yes ☐ No
- Is the floor free from stains or puddles of liquid? ☒ Yes ☐ No
- Is the area free of other spill or fire hazards? ☒ Yes ☐ No
- Are incompatible wastes separated? ☒ Yes ☐ No

*NO
INVENTORY*

Note volume of each accumulated waste: (Do not list used oil, bulbs, batteries, mercury switches or other universal wastes)

Quantity	Item Description	Date on Container

If you check "No" to any of the questions above, please explain below:

Action Item	Corrective Action	Date Completed

**Clorox Products Manufacturing Company
Hazardous Waste Weekly Inspection Form**

Date: 3/11/11

Inspector: L. Asken

Hazardous Waste Storage Areas/Containers Inspection Results:

- Do all drums have proper labels? ☒ Yes ☐ No
- Does the label indicate an accumulation start date? ☒ Yes ☐ No
- Does the label indicate the container contents? ☒ Yes ☐ No
- Are dates on drums less than 180 days old? ☒ Yes ☐ No
- Are all drums in good condition? ☒ Yes ☐ No
- No leaking containers? ☒ Yes ☐ No
- No containers rusting or deteriorating? ☒ Yes ☐ No
- Drums securely closed ☒ Yes ☐ No
- Is the floor free from stains or puddles of liquid? ☒ Yes ☐ No
- Is the area free of other spill or fire hazards? ☒ Yes ☐ No
- Are incompatible wastes separated? ☒ Yes ☐ No

Note volume of each accumulated waste: (Do not list used oil, bulbs, batteries, mercury switches or other universal wastes)

Quantity	Item Description	Date on Container

If you check "No" to any of the questions above, please explain below:

Action Item	Corrective Action	Date Completed